

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

E.I. DU PONT DE NEMOURS AND
COMPANY, a Delaware corporation

Plaintiff,

V.

CANYON GROUP LLC a Delaware limited liability company, and NISSAN CHEMICAL INDUSTRIES, LTD., a Japanese corporation

Defendants.

C.A. NO. _____

MOTION FOR LEAVE TO FILE A COMPLAINT UNDER SEAL

Plaintiff E. I. du Pont de Nemours and Company (“DuPont”), by and through undersigned counsel, hereby seeks leave to filed its Complaint and all attachments thereto in the above-captioned matter under seal. In support of this motion, DuPont states as follows:

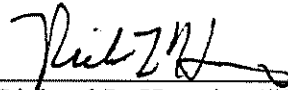
1. DuPont's Complaint against Canyon Group LLC and Nissan Chemical Industries, Ltd. (collectively, "Defendants") seeks, *inter alia*, an order of this Court enjoining Defendants, or any of Defendants' affiliates or contractual partners from using confidential and proprietary information to formulate, offer to sell, sell, distribute or use certain products in the United States, Canada, Central America, South America, the Caribbean Islands, Australia or Thailand until the dispute over the exclusivity terms of a Development/License Agreement is resolved through arbitration or until August 11, 2009 when the Development/License Agreement expires.

2. DuPont's Complaint contains allegations in support of its requested relief that reveal confidential and proprietary information that DuPont seeks to protect. The exhibits to the Complaint also contain confidential and proprietary information that DuPont seeks to protect.

3. In addition, Article 12 of the Development/License Agreement requires DuPont to keep confidential certain data or inventions, discoveries or improvements except under limited circumstances, none of which apply in the present case.

WHEREFORE, DuPont respectfully requests leave to file the Complaint and exhibits thereto in this matter under seal.

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DATED: April 7, 2005
PA&C 677054v1

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C.A. NO. _____

ORDER

AND NOW, having considered the Motion for Leave to File A Complaint Under
Seal of Plaintiff, E. I. du Pont de Nemours and Company, and for good cause shown,

IT IS HEREBY ORDERED this _____ day of April 2005, that Plaintiff may file its Complaint and the attachments thereto in the above-captioned matter under seal.

United States District Court Judge